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UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

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DAMETRIA NEVELS,

Plaintiff,

v.

ROLLIN COOK, KENNETH SIO, et. al.,

Defendants.

ANSWER

Case No. 1:17-cv-00037 EJF

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ANSWER

Defendant Kenneth Sio (“Defendant”) answers Plaintiff’s complaint as follows:

1. Responding to paragraphs 2, 6, 9, 16, 17, 18, 19, 25, 28, and 31, Defendant admits said allegations.
2. Responding to paragraphs 3, 4, 14, 20, 21, 22, 23, 24, 26, 27, 29, 30, 35, 36, 37, 39, 40, 42, 43, 44, 45, 46, 48, 49, 51, 52, 53, 55, 56, 57, 58, 59, 61, 62, 64, 65, 66, 68, 69, 70, 73, 81, 82, and 87, Defendant denies said allegations.

3. Responding to paragraphs 1, 5, 7, 8, 10, 11, 12, 13, 15, 32, 33, 34, 38, 41, 47, 50, 54, 60, 63, 67, 71, 72, 74, 75, 76, 77, 78, 79, 80, 83, 84, 85, 86, 88, and 89 Defendant lacks sufficient information to form an answer and therefore denies the same.

4. All other paragraphs of the complaint not specifically admitted herein are denied.

#### AFFIRMATIVE DEFENSES

Defendant sets forth the following affirmative defenses:

1. The court lacks jurisdiction over the subject matter.
2. The court lacks jurisdiction over the Defendant.
3. This Court is not the proper venue for this action.
4. The process in this matter was insufficient.
5. The service of process in this matter was insufficient.
6. Plaintiff's complaint fails to state a claim upon which relief may be granted.
7. Plaintiff has failed to join an indispensable party.
8. Plaintiff claims are barred to the extent that the doctrines of laches, waiver, estoppels, accord and satisfaction, and/ or unclean hands apply.
9. Defendant reserves all other applicable affirmative defenses that are not yet known.

DATED this 14th day of April, 2017.

SALCIDO LAW FIRM PLLC

/s/ Jon Hogelin

Jon Hogelin

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of April, 2017, I caused a true and correct copy of  
the foregoing

ANSWER

to be served on the persons and in the manners stated below:

Jonathan Hanks  
Attorney for Plaintiff  
Ascendus Law PC  
470 24th St. Suite 206  
Ogden, UT 84401

- ☐ U.S. Mail (first-class, postage prepaid)
- ☐ Facsimile
- ☒ Electronic Filing
- ☐ Hand Delivery
- ☐ Overnight Courier

/s/ Jon Hogelin